

Exhibit 12

Kildeskatteloven

§ 69 B. Har nogen, der er skattepligtige efter § 2 eller selskabsskattelovens § 2, modtaget udbytte, royalty eller renter, hvori der efter §§ 65-65 D er indeholdt kildeskat, som overstiger den endelige skat efter en dobbeltbeskatningsoverenskomst, direktiv 2011/96/EU om en fælles beskatningsordning for moder- og datterselskaber fra forskellige medlemsstater eller direktiv 2003/49/EU om en fælles ordning for beskatning af renter eller royalties, tilbagebetales beløbet inden 6 måneder fra told- og skatteforvaltningens modtagelse af anmodning om tilbagebetaling. Sker tilbagebetaling efter dette tidspunkt, tilkommer der den skattepligtige en rente svarende til renten efter opkrævningslovens § 7, stk. 2, med tillæg af 0,4 procentpoint pr. påbegyndt måned.

The Danish Income Tax Act – (also referred to as the Danish Withholding Tax Act)

§ 69 B. If any person who, pursuant to § 2 or to § 2 of the Danish Corporation Tax Act, has received dividends, royalties or interest on which, according to §§ 65-65d, there is a withholding tax which exceeds the final tax, pursuant to a double taxation agreement, Directive 2011/96/EU regarding a common taxation scheme for parent and subsidiary companies of different Member States or Directive 2003/49/EU regarding a common system for taxation of interest or royalties, the amount shall be refunded within 6 months of receipt of the request for repayment by the Danish Customs and Tax Administration. In the event of repayment after this date, the taxpayer is entitled to late payment interest at a rate in accordance with § 7, para. 2 of the Danish Tax Collection Act, plus 0.4 percentage points per commenced month.



Certification of Translation

I, the undersigned, Elena Michalski, Senior Production Manager of Compass Languages, a professional translation agency based at 147 Old Solomons Island Rd, Suite 302, Annapolis, MD 21401 (EIN: 134194307) certify that the content of the following original document(s):

- Kildeskatteloven sec. 65 with EN translation
- Kildeskatteloven sec. 69 with EN translation
- Klage Captia - COLE EN
- Ligningsloven with EN translation
- Selskabsskatteloven with EN translation

Have been proofread and deemed accurately translated from Danish into English according to the standards laid out by the American Translators Association.

Signed: E. Michalski
Elena Michalski
Senior Production Manager

Date: August 10, 2018



Cindy A. Galloway
8/10/18